



Wes Moore | Governor
Aruna Miller | Lt. Governor
Katie Savage | Secretary

TO: House Ways and Means Committee
FROM: Department of Information Technology
RE: House Bill 1391- Education - Artificial Intelligence - Guidelines, Professional Development, and Task Force
DATE: March 11, 2025
POSITION: Letter of Concern

Delegate Atterbeary
House Ways and Means Committee
131 Taylor House Office Building
Annapolis, Maryland 21401

Dear Chairman Atterbeary,

The Department of Information Technology (DoIT) acknowledges the intent of House Bill 1391, *Education – Artificial Intelligence – Guidelines, Professional Development, and Task Force*, and appreciates the opportunity to engage with its proposed actions. House Bill 1391 establishes guidelines and policies for the use of artificial intelligence (AI) in K–12 education. The Maryland State Department of Education (MSDE), in consultation with the State Board of Education and the Task Force on Artificial Intelligence in K–12 Education, must develop or update AI guidance to promote safe, responsible, and ethical AI use in schools.

However, DoIT is not positioned to develop, maintain, and annually update an LEA-specific Approved List of AI tools. This process requires sector-specific expertise that extends beyond DoIT's scope. Instead, we propose adhering to DoIT's current role in providing statewide, non-sector-specific guidance, focusing on defining requirements and best practices for various AI tool categories—such as AI coding assistants and AI transcription tools—which the Maryland State Department of Education (MSDE) can further tailor to the education sector.

DoIT also has concerns regarding the inventory-related provisions of HB 1391, particularly the requirement for consultation with DoIT. The responsibility for this inventory would likely fall on both the AI Enablement team (AET) and the Governance, Risk, and Compliance (GRC) teams. Both AET and GRC teams collaborate to build out policies. However, the additional workload required by this bill would significantly strain their capacity, as they are already engaged in broader AI policy initiatives applicable across agencies.



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The AI Enablement team (AET) is a new, small team of three members, catalyzing state-wide AI enablement by shaping policies, procedures, infrastructure, experimentation, procurement pathways, and other artifacts to drive execution on the 2025 AI Strategy shared with the General Assembly. The outputs of AET are meant to be general and useful for all agencies, becoming a model for agencies to apply their sector-specific guidelines and adoption execution. Given these constraints, DoIT respectfully requests that our agency be removed from the bill, as AET does not have the resources to support MSDE in managing education-focused AI tools.

Furthermore, many of the objectives outlined in HB 1391 are already being addressed through existing efforts. AET's policy outputs—such as broader AI governance frameworks, inventory standards, experimentation pathways, and training—is and will be readily available to MSDE to support its AI initiatives. Additionally, DoIT intends to assist MSDE in identifying fellows, staff, or vendors capable of supporting this work, with a focus on capacity-building. MSDE will also have access to policy guidance from both the GRC and AET teams, along with input from a coalition of stakeholders, as recognized in the bill.

For these reasons, I respectfully urge the committee to re-consider a consolidation of bills. Thank you for your time and consideration.

Best,

Melissa Leaman
Acting Secretary
Department of Information Technology